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TAXATION IN VIETNAM

2016

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General Overview

In Vietnam, the taxation system is overseen by the General Department of Taxation ("GDT"), which falls under the supervision of the Ministry of Finance ("MOF").

Tax registration certificate and business registration certificate of your business will be obtained from the local business registration office under the Department of Planning and Investment ("DPI") within 14 working days from the submitted date of your application documents.

The tax year is the fiscal year. A business has to notify the tax authorities if its fiscal year differs from the calendar year and in such case, only quarter ended fiscal year is allowed.

All taxes are imposed at the national level. There are no local, state or provincial taxes.

The business activities or investments in Vietnam will be effected by the following taxes:

- Corporation Income Tax ("CIT")
- Value Added Tax ("VAT")
- Withholding Tax or Foreign Contractor Tax ("FCT")
- Personal Income Tax ("PIT")
- Import and Export Duties
- Special Sales Tax ("SST")
- Other taxes
- Double Tax Agreement ("DTA")

Corporation Income Tax ("CIT")

Residence

A corporation generally is considered to be resident if it is incorporated in Vietnam. Residents are taxed on worldwide income (Non-residents are taxed only on Vietnam source income). Oversea source income delivered by residents is subject to CIT in the same way as Vietnam source income.

Tax rates

The standard CIT is 20% from 01/01/2016. In the oil and gas and nature resource sectors, the tax rates are ranges from 32% to 50%, depending on the project.

Tax incentives

Preferential tax rates of 10% and 15% for 15 and 10 years respectively, are available for the corporation engaged in encouraged investment projects (including education, healthcare, sport/culture, high technology, environmental protection, scientific research, infrastructural development, software production and renewable energy) or encourage areas (including qualifying economic and high-tech zones, certain industrial zones and difficult socio-economic areas), as stipulated by the government.

From 01/01/2016, corporations entitled to the preferential CIT rate of 20% before that will enjoy the rate of 17% instead. When the preferential rate expires, the CIT rate reverts to the standard rate.

A tax holiday of up to 4 years and 50% reduction for up to 9 years are available from the first profit making year or the fourth revenue generation year, which ever come first.

Additional tax reductions may be available for corporation employ many female employees or employ ethnic minorities' employees.

Tax incentives do not apply to other income, which is broadly defined.

Calculation of taxable profits

Taxable profits are the difference of total taxable revenue and taxable expenses, whether, local or oversea source income, plus with other assessable income.

Annual CIT return includes the reconciliation of accounting profits and taxable profits.

Taxable revenues

Taxable revenue includes revenue from sale of products; the provision of services; the leasing or sale assets; transfer of property, share or a business; income from joint venture operation with other corporation/business; and financial operation.

There is not much difference between accounting revenue and taxable revenue. Except for some cases such as if the corporate issue tax invoices for deferred revenue when clients paid the advances, then it will be considered as taxable income.

Taxable expenses

Expenses are taxable expenses if they relate to the generation of revenue, and are properly supported by suitable sufficient documentations, including bank transfer vouchers if the invoice amount is or over VND20 million. Other expenses do not meet with these conditions will be considered as non-taxable expenses such as:

- Amortisation, depreciation costs are not in accordance with the prevailing regulations;
- Labor costs are not actually paid to employees or not stated clear in the labor contract;
- Provision for bad debts, devaluation of inventories and investments…are not in accordance with the prevailing regulations;
- Unrealised foreign exchange loss due to the year-end revaluation of foreign currencies items other than account payables;
- Donation costs (except certain donation for education and healthcare with supported sufficient documentations);
- Penalties, fines, late payment interest;
- Advertising and promotion expenses (excluding certain items such as payment discounts, market research, trade fairs, commissions for insurance and multi-level marketing) exceeding 15% of total other deductible expenses (it will be removed from 01/01/2015);

Business entities in Vietnam area allowed to establish a tax deductible research & development fund to which they can appropriate up to 10% of annual profits before tax. Various conditions apply.

Tax losses

Corporation may carried forward tax losses fully and consecutively and offset against the profits of subsequent years for a maximum of five years. Carry back of tax losses is not allowed. There is no provision for any form of consolidated filing or group loss relief.

From 1 January 2014, losses from activities of real property assignments and transfer investment projects are also allowed to be offset against income from activities of production and business or from other income.

Transfer of shares and assets

Gains from the transfer of shares are taxed at the prevailing standard corporate tax rate. Currently there is no registration fee on the transfer of shares.

Gains from the transfer of assets should be subject to the prevailing standard corporate tax rate. Where a registerable assets (such as houses, land, ships, cruisers and boats, automobiles, motorcycles, aircrafts etc.) is transferred, the new owner will be required to pay registration fees. Registration fee rates vary from 0.5 percent to 20 percent depending on the asset transferred.

Capital gain tax

Capital gains made by a corporation in Vietnam will form part of the taxable income of the corporation and will be taxed at the prevailing standard corporate tax rate. There are specific rules for corporate income tax imposed on the transfer of capital in a corporation or sale of securities by investors. The purchase price and transfer expenses are generally deducted from the transfer price in order to calculate the taxable capital gain.

Compliance requirements

There are four types of filling, as follows:

- Quarterly return (before or on the 30th day following the end of each quarter);
- Annual return (before or on the 90th day following the end of the calendar year or fiscal year);
- Ad hoc (transaction based) returns (before or on the 10th day following the date of incurrence of tax liability);
- Return for cessation of business, completion of contract, change of ownership or re-organisation (before or on the 45th day following the event or completion of the transaction date);

Where a taxpayer has a dependent accounting unit (e.g. branch) in a different province, a single CIT return is required. However, manufacturing companies are required to allocate tax payments to the various provincial tax authorities in the locations where they have dependent manufacturing establishments. The basis for allocation is the proportion of expenditure incurred by each manufacturing establishment over the total expenditure of the company.

Profit remittance and taxation of dividends

Dividend paid by a corporation in Vietnam to its shareholders (local and oversea) are not subject to tax.

A corporation is permitted to remit profits annually at the fiscal year ending or upon termination of the investment in Vietnam. A corporation is not permitted to remit profits if the corporation has accumulated losses.

Company are required to notify the tax authorities of the plan to remit profits at least 7 working days before the scheduled remittance.

Transfer pricing

Transfer pricing has become one of the tax authorities' priorities in relation to tax administration in the recent years.

Under definition of related parties, the control threshold is lower than in many other countries (20%) and the definition also extends to certain significant suppliers, customers and funding relationships between otherwise unrelated parties. Vietnam's transfer pricing rules also extend to domestic related party transactions.

The tax authorities are given power to make transfer price adjustments with respect to non-arm's length related party transactions, where taxpayers' fail to comply with the transfer pricing requirements.

Taxpayers are required to disclose their related party transactions and transfer pricing methodologies used when filing their annual corporate tax return.

In addition, the burden of proof is on taxpayers to demonstrate that related party transactions are carried out on arm's length terms. Therefore, taxpayers are required to prepare and maintain contemporaneous transfer pricing documentation which is required to be submitted to the tax authorities within 30 working days of a request.

Value added tax ("VAT")

VAT applies to goods and services used for production, trading and consumption in Vietnam. It also applies on the duty paid value of imported goods.

VAT payable is calculated as the output VAT charged to customers less the input VAT suffered on purchases of goods and service.

Tax payers are the corporation who provide the taxable services or manufacture or trade the taxable goods.

Tax rates

The standard rate of VAT in Vietnam is 10%; Exports of goods and services are subject to 0%; a rate of 5% applies to specified essential goods. Certain items are exempt from or not subject to the VAT.

Certain goods and services are not subject to VAT as below:

- Certain agriculture products;
- Transfer land use right;
- Certain financial services;
- Education and healthcare services;
- Foreign currency trading;
- Debt factoring;
- Printing and publications;
- Public transportation services;
- And other certain items;

Certain goods and services exempt from VAT as below:

- Collections on behalf of other parties which are not involved in the provision of goods/services;
- Certain inter-group assets transfer;
- Transfers of emission rights and other financial revenues;
- Transfer investment projects;
- Capital contributions in kind;
- Certain services rendered by oversea organisation which does not have Permanent Establishment in Vietnam where the services are rendered in oversea (eg. advertising/marketing, promotion of investment, training….. in oversea);
- Raw agriculture products or only have just been through preliminary processing;
- Other certain items;

Tax rate of 0% applies to exported goods and services including goods sold to duty free shops, certain exported services, construction and installation carried out for export processing enterprises, aviation, marine and international transportation services.

Tax rate of 5% applies generally to areas of the economy concerned with the provision of essential goods and services. These include purified water; fertilizer production; training aids; books; unprocessed foodstuffs; medicine and medical equipment; husbandry feed; various agricultural products and services; technical/scientific services; rubber latex; sugar and its by-products; certain cultural, artistic, sport services/products and social housing.

Standard rate of 10% applies for remaining goods and services.

The highest rate of the business will be applies for its item which is not able to readily classified on the tax tariff.

VAT Calculation/Declaration Method

There are 2 (two) methods, direct method and deduction method.

Deduction method

Business establishments with annual revenue subject to VAT of VND1billion or more; and foreign contractors operating in the field of exploration and exploitation of gas and oil have to apply deduction method.

The business establishments maintaining full books of accounts, invoices and documents in accordance with the relevant prevailing regulations is allowed to apply deduction method.

VAT payable = Output VAT – Input VAT

- Output VAT is calculated by multiplying taxable prices with applicable tax rate. In imported good cases, taxable prices include import duties and special sale tax (if any) and environment protection tax (if any).
- Input VAT is based on VAT invoices or custom declaration for import goods cases. For VAT invoice with the value exceeding VND20 million, the input VAT can only be claimed if business maintain sufficient documents for payment in non- cash form (bank payment documents and other kinds of non-cash payment instruments).

If a business sells exempt goods or services it cannot recover any input VAT paid on its purchases.

If a business generates both VAT and VAT exempt sales, it can only claim an input VAT credit for the portion of inputs used in the VAT activity.

Direct method

This method applies to:

- Business establishments with annual revenue subject to VAT of less than VND1billion;
- Individuals and business households;
- Business establishments which do not maintain proper books of account and foreign organisations or individuals carrying out business activities in forms not regulated in the Law on Investment;
- Business establishments engaging in trading in gold, silver and precious stones.

VAT payable is calculated by multiplying the revenue of goods or services with deemed VAT rates.

Deemed VAT rates are regulated as below:

- Distribution and trading of goods: 1%;
- Services and construction without supply of materials: 5%;
- Manufacturing, transportation, services associated with goods, construction with supply of materials: 3%;
- Other business activities: 2%.

Once selected, the VAT declaration method must be maintained for 2 consecutive years.

Refund

Export goods or services business or new investment business/projects shall have VAT refunded if amount of input VAT not yet credited is of VND300 million or more.

Compliance requirements

Taxpayers must file VAT returns monthly and payment outstanding VAT payable by the 20th day of the subsequent month.

Quarterly tax filing and payment is allowed for certain taxpayers, which are due by the 30th day of the following quarter.

Foreign Contractor Tax ("FCT")

FCT applies to certain payments to oversee parties who are carrying the business activities and do not have a licensed presence in Vietnam. The business activities include interest, royalties, service fees, leasing fees, insurance fees, transportation fees, transfers of securities and goods supplied within Vietnam or associated with services rendered in Vietnam.

This tax is withheld from the payments made to such parties by their Vietnamese customers or contracting parties.

It normally comprises a combination of CIT and VAT at varying rates. However it also include Personal Income Tax for payments to foreign individuals.

Tax calculation/declaration methods

There are 3 (three) methods which are direct method, deduction method and hybrid method.

Deduction method

This method is applied for the foreign contract or registering for VAT purposes and filing CIT and VAT returns in the same way as a local entity. They have to meet all the following requirements:

- Having a Permanent Establishment or to be a tax resident in Vietnam;
- The duration of the project in Vietnam ismore than 182 days; and
- Adopting the full Vietnam Accounting System ("VAS") for their accounting books and completing tax registration and are granted a tax code by tax authorities.

Direct method

Foreign contractors adopting direct method do not need to register for VAT purposes nor file CIT or VAT returns. It will be withheld by the Vietnamese parties at prescribed rates from the payments made to the foreign contractors.

Hybrid method

The hybrid method allows foreign contractors to register for VAT and accordingly pay VAT based on the deduction method but with CIT being paid under the direct method rates on gross turnover. They have to meet all the requirements the same with requirements in deduction method.

Tax rates

VAT and CIT rates are summarized as below table:

No.	Business activities	Deemed CIT rate (%)	Deemed VAT rate
1	Supply of goods in Vietnam or associated with services rendered in Vietnam (including in-country import-export and imports under DDP, DAT or DAP delivery terms)	1%	0%
2	Services, leasing of machinery and equipment. Except for	5%	5%
	- Services together with supply of machinery and equipment (the contract does not separate the value of goods and services)	2%	3%
	- Restaurant, hotel and casino management services	10%	5%
	- Financial derivatives	2%	Exempt
3	Leasing of aircraft, vessels and drilling rigs (including components)	2%	Exempt
4	Construction, installation without supply of materials, machinery or equipment.	2%	3%
5	Transportation (Sea and Air)	2%	3%
6	Re-insurance, commision for insurance, transfer of securities.	0,1%	Exempt
7	Insurance, Interest	5%	Exempt
8	Royalties	10%	Exempt

(*)VATwill not be payable where goods are exempt from VAT or where import VAT is paid.

Personal Income Tax ("PIT")

Residence

An individual is considered as a resident if she/he:

- Spent 183 days or more in aggregate in a 12 months in Vietnam which start from the date she/he arrives in Vietnam;
- Maintain a residence in Vietnam; or
- Has leased a residence for 183 days or more in a tax year unless she/he can prove residence in other country;

Tax residents are taxed on their worldwide income and based on a progressive tax rates basis. Non tax residents are taxed only on Vietnam source income and based on flat rate of 20%;

Tax year

The calendar year is considered tax year. However, at the first arrival calendar year, an individual is present in Vietnam for less than 183 days, then his/her first tax year will be the 12 months period from the date of arrival. Subsequently, the tax year is the calendar year.

Taxable income

Employment income, including most employment benefits (whether in cash or in kind), are fully taxable.

Non-employment income, including dividends, interest (except for bank deposits, life insurance and government bonds), capital gains derived from securities trading, private business income (over VND100 million per year) and other income from franchising, inheritance, the transfer of land use rights, gift, wining prizes (excluding winning prizes from casino) also are taxable.

Deductions and Allowances

1. Contributions to mandatory social, health and unemployment insurance schemes;
2. Contributions to local voluntary pension schemes;
3. Contributions to certain approved charities;
4. Tax allowances:
    - Personal allowance: VND9 million/month;
    - Dependent allowance: VND3.6 million/month/dependent. The dependent allowance is not automatically granted, and the tay payer needs to register qualifying dependents and provide sufficient documents to tax authorities;
5. Severance allowance, redundancy compensation, Interest earned on bank deposits, life/non-life insurance compensation, retirement pensions … are not taxable;

Tax rates

Tax residents

Tax rate for employment and business income

Annual taxable income (millions VND)	Monthly taxable income (millions VND)	Rate (%)
0-60	0-5	5%
60-120	5-10	10%
120-216	10-18	15%
216-384	18-32	20%
384-624	32-52	25%
624-960	52-80	30%
More than 960	More than 80	35%

Tax rates for other incomes

Other taxable income	Rate
Interests/Dividends	5%
Net gain share transfer, capital assignment	20%
The proceeds of share transfer	0.1%
Net gain sale of real estate	25%
The proceeds of sale of real estate	2%
Copyright, franchising, royalties income	5%
Winning prizes, inheritances/gifts income	10%

Non-residents

Other taxable income	Rate
Employment income	20%
Business income	1%-5%
Interest/dividends	5%
The proceeds of share transfer	0.1%
The proceeds of real estate transfer	2%
Copyright, franchising, royalties income	5%
Winning prizes, inheritances/gifts income	10%

Compliance requirements

Tax payers are required to submit tax registration to tax authorities to obtain the tax code.

For employee income, tax return has to submit and paid on the monthly basis by the 20th days of the following month or on quarterly basis by the 30th day of the following quarter. The annual return has to submit and paid any additional tax liability within 90 days from year end.

For non-employee income, the tax return has to submit and paid on regular basis when income is received.

Special Sales Tax ("SST")

Special Sales Tax applies to the production or import of certain goods including cigarettes, cigars, spirits, beer, certain automobiles, assorted types of petrol, air conditioners and the provision of certain services including dance halls, massage parlors, casinos, golf clubs and lotteries. Exported goods are not subject to SST

Taxpayers producing SST liable goods from SST liable raw materials are entitled to claim a credit for the SST amount paid on raw materials imported or purchased from domestic manufacturers.

Tax rates range from 10 percent to 70 percent as below:

Products/Services	Rate
Petrol, Air-conditioner (not more than 90,000BTU)	10%
Automobiles having less than 24 seats	10%-60%
Lotteries	15%
Golf, Motorcycles of cylinder capacity above 125cm3	20%
Spirit/Wine	25%-50%
Airplanes, Boats, Massage, karaoke, Casino, jackpot games and betting entertainment	30%
Discotheques, Playing cards	40%
Beer	50%
Cigar/Cigarette	65%
Votive papers	70%

Import and Export Duties

Vietnam is member of WTO and FTAs, therefore Import and export duty rates are subject to frequent changes as commitment and it is always prudent to check the latest position.

Import duty rates are classified into 3 categories: ordinary rates, preferential rates and special preferential rates. Preferential rates are applicable to imported goods from countries that have Most Favoured Nation (MFN, also known as Normal Trade Relations) status with Vietnam (members of WTO).

Special preferential rates are applicable to imported goods from countries that have a special preferential trade agreement with Vietnam (FTAs).

The dutiable value of imported goods is typically based on the transaction value (the price paid or payable for the imported goods, and where appropriate, adjusted for certain dutiable or non-dutiable elements). Where the transaction value is not applied, alternative methodologies for the calculation of the customs value will be used.

There are various cases where a refund of import duties is possible.

Export duties are charged only on a few items, basically natural resources such as sand, chalk, marble, granite, ore, crude oil, forest products, and scrap metal. Tax rates range from 0% to 40%. The tax base for computation of export duties is the FOB.

Other Taxes

Property taxes

Property tax includes land-use fee, land rental and non-agricultural land-use tax.

The land-use fee applies to organisations which are allocated land by the State to develop infrastructure for sale or for lease. The duration of land usage under this category should be "long term stable use".

Land rental is the amount an investor may pay to lease (or rent) land in Vietnam. The amount varies depending on a number of factors, including, location of the land and the value of the land. Payment of the lease can be for a long and fixed period of time or annually.

Non-agricultural land-use tax applies to residential land in rural/urban areas and non-agricultural land used for business purposes. The calculation of tax liability is based on the land area, price of land and tax rate.

Natural resource tax

Natural resource tax is imposed on the exploitation and use of natural resources including metallic or non-metallic minerals, crude oil, natural gas, coal gas, natural forest products, natural marine products, natural water, swallow's nests, and other natural resources. The applicable tax rates vary depending on the specific classification of natural resources and/or production output.

Business license tax

Business license tax is imposed on economic organisations in accordance with the registered capital in the business registration license or the investment license, ranging from VND1 million to VND3 million per year. Payment of BLT is due upon registration of business for tax purpose and subsequently on an annual basis.

Environment protection tax and fee

Vietnam introduced Environment Protection Tax (EPT) in 2012, which is aimed to impose tax on goods, which may cause damage to the environment, such as gasoline, oil and grease, coal and certain chemicals.

Beside EPT, Vietnam has also introduced Environment Protection Fee (EPF). EPF is aimed at businesses engaging in mining natural resources including crude oil, natural gas, coal gas, and both metallic and non-metallic minerals. Rates vary depending on the type of mineral.

Stamp duty

Stamp duty (formally known in Vietnam as a "Registration Fee") only applies on the required registration of ownership of certain assets, including buildings/land, transportation vehicles and guns.

Tax rates vary between 0.5 percent and 20 percent.

Tax Audits and Penalties

Tax audits are carried out regularly and often cover a number of tax years. Before conducting an audit, the tax authorities will send the taxpayer a written notice specifying the timing and scope of the tax audit.

There are detailed regulations setting out penalties for various tax offences. These range from relatively minor administrative penalties through to tax penalties amounting to various multiples of the additional tax assessed. For discrepancies identified by the tax authorities (e.g. upon audit), a 20% penalty will be imposed on the amount of tax under-declared. Late payment of tax is subject to interest of 0.05% of the tax liability for each day late, calculated from the statutory deadline to the date of actual payment if the number of days late is less than 90 days. Beyond 90 days, the daily interest rate increases to 0.07%.

The general statute of limitations for imposing tax is 10 years (effective 1 July 2013) and for penalties is 5 years. Where the taxpayer did not register for tax or commits evasion liable to criminal prosecution, the tax authorities can collect unpaid tax and penalties at any time.

Double Taxation Agreements (“DTAs”)

Vietnam has signed up to more than 66 DTAs and there are a number of others at various stages of negotiation.

The CIT withholding taxes may be affected by a relevant DTA. The withholding tax rates range is from nil to 15%. List of DTAs is presented as belows:

In Force		
Australia	Ireland	Romania
Austria	Israel	Russia
Bangladesh	Italy	Saudi Arabia
Belarus	Japan	Serbia
Belgium	South Korea	Seychelles
Brunei	North Korea	Singapore
Bulgaria	Laos	Slovakia
Canada	Luxembourg	Spain
China	Malaysia	Sri Lanka
Cuba	Mongolia	Sweden
Czech Republic	Morocco	Switzerland
Denmark	Myanmar	Taiwan
Finland	Netherlands	Thailand
France	New Zealand	Tunisia
Germany	Norway	UAE
Hong Kong	Oman	Ukraine
Hungary	Pakistan	United Kingdom
Iceland	Philippines	Uzbekistan
India	Poland	Venezuela
Indonesia	Qatar	

Not yet in force (full or a proportion)		
Algeria	Hong Kong	Palestine
Azerbaijan	Kazakhstan	Turkey
Belgium	Kuwait	
Egypt	Mozambique	

Free Trade Agreements ("FTA")

In Force	
	Bilateral agreements
	- Canada
	- Chile
	- Israel
	- Japan
	- Switzerland
	- United States of America
	- South Korea
	- European Union (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom)
	ASEAN agreements
	- ASEAN – Australia – New Zealand Free Trade Area (AANZFTA)
	- ASEAN–China Free Trade Area (ACFTA)
	- ASEAN–India Free Trade Area (AIFTA)
	- ASEAN–Japan Comprehensive Economic Partnership (AJCEP)
	- ASEAN–Korea Free Trade Area (AKFTA)

Being negotiated	
	- ASEAN-Canada Trade and Investment Framework Agreement: (TIFA)
	- ASEAN-EU
	- Vietnam-EU: (EVFTA)
	- Vietnam – FTA of EU: (EFTA)
	- Trans-Pacific Partnership: (TTP)

AC&C services

We provide the wide range of advisory services by the experienced and knowledgeable teams in many industries and sectors. We attain to support our client to achieve their business goals as well as the sustainability development in Vietnam.

Our professional teams are dedicated to creating distinctive and innovative solutions to our clients. Our approach commences from the developing a depth and fully understanding of your business operations, and then focuses to minimize risks and propose the effective solutions to you.

Our services:

Advisory services

- Business health-check
- Internal Control System/Management Accounting
- Business Restructuring
- CFO loan staff/Monthly financial retainer
- Governance, Risk and Compliance
- Financial/Tax Due Diligence
- Investment appraisal
- Internal/External Audit/Review

Tax services

- Tax consulting and compliance
- Tax health-check
- Tax review/audit
- Monthly tax retainer

Legal services

- Business and Investment Advisory
- Legal compliance
- Licensing

Outsourcing services

- Human Resource and Payroll
- Book-keeping
- Tax declaration
- Tax returns

Contacts

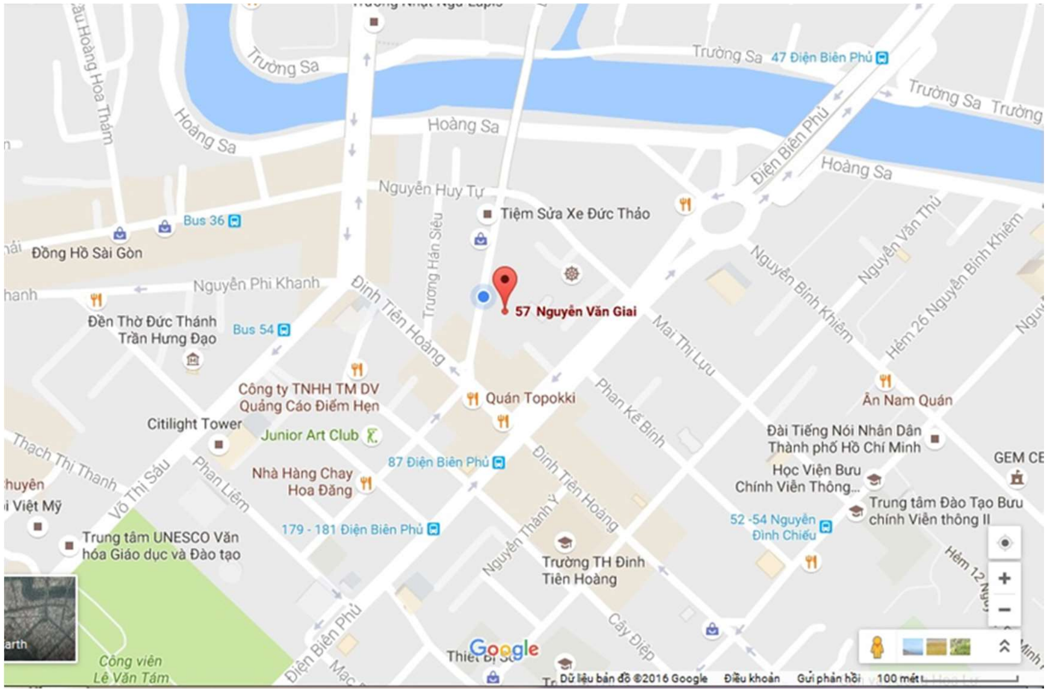
AC&C Consulting Co Ltd
1st Floor, Ha Vinh Building, 55-57 Nguyen Van Giai Street, District 1
Ho Chi Minh City, Viet Nam

T : +84 8 6676 7382
W: www.ac-c.com.vn

Tran Vuong Vu M: +84 9 0890 5098
Managing Partner E: vu.tran@ac-c.com.vn

Nguyen Phan Duong Nguyen M: +84 9 0360 9673
Business Advisory Partner E: nguyen.nguyen@ac-c.com.vn

Phan Hong Son M: +84 9 0892 6879
Legal Partner E: son.phan@ac-c.com.vn



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